National Planning Framework 4 Team
Scottish Government
Area 2F South
Victoria Quay
Edinburgh
EH6 6QQ

19 February 2021

**By email only to scotplan@gov.scot**

Dear Sir/Madam,

**NATIONAL PLANNING FRAMEWORK 4 POSITION STATEMENT**

This response to the National Planning Framework 4 Position Statement is written on behalf of AGS Airports, the owner of Aberdeen and Glasgow airports. We refer also to Glasgow Airport's response to the Call for Ideas date 30th April 2020.

Aberdeen and Glasgow Airports are assets of strategic national importance and pivotal to regional economic wellbeing. Scotland's relative peripherality means they play a uniquely vital role facilitating trade, tourism and inward investment. Both airports directly support thousands of jobs and generate millions of pounds of GVA. They are also the hub of clusters of economic activity attracted by connectivity and agglomeration benefits.

The Position Statement makes a number of welcome references acknowledging the importance of strategic connectivity to several policy priorities and the role NPF4 plays in supporting co-ordination and enhancement. The Scottish Government's Programme for Government highlighted the important role of NPF4 in responding to the challenges of climate change and COVID-19. We would add to that the challenges arising from Brexit related issues.

Connectivity is highlighted as a shared priority and a challenge to be addressed locally, regionally and nationally. The indicative Regional Spatial Strategy for Glasgow includes the following statement which draws together the requirement for strategic airport enhancements, good connectivity and sustainable surface access via Glasgow Metro:

> *"In terms of connectivity by air the City Region's competitive position is significantly dependent upon its ability to access its various economic markets efficiently and effectively. In this regard strategic airport enhancements will be required to support the gateway and hub functions of Glasgow Airport including enhanced accessibility by public transport as part of the proposed 'Glasgow Metro'."*

Glasgow Airport is highlighted as a key spatial priority within Clyde Corridor/Clyde Mission. The regional importance of Aberdeen Airport is highlighted within equivalent plans.

In addition to emerging regional strategies, we wanted to draw attention to a number of pertinent documents and initiatives that are relevant to airports, connectivity and NPF4, some of which are relatively recent. These include:

### A Trading Nation – a plan for growing Scotland's exports
*"A safe, efficient, effective and sustainable transport system, for both passengers and freight, remains one of the key enablers for sustainable economic growth."*

*"We recognise the vital importance of a strong international air route network that connects Scottish businesses to their customers."*

*"We will consider support measures to improve sustainable surface access to Scotland's airports and seaports."*

### National Transport Strategy Delivery Plan
*"We will identify opportunities to ensure gateways to and from international markets are resilient and integrated into the wider transport networks to encourage people to live, study, visit and invest in Scotland to help our economic recovery."*

*"We will continue to work in partnership… to restore connectivity for business and tourism, returning as soon as possible to the levels of international connectivity we had in 2019, while also continuing work to secure direct routes to new and emerging markets. Our overall objective is to help restore connectivity to previous levels but not restore aviation emissions to previous levels."*

### Scotland's Inward Investment Plan
*"Investors have provided a clear steer as to their priorities for government policy, specifically… the reliability of the infrastructure..."*

*"The outcomes from STPR2 will help achieve the outcomes of our National Transport Strategy… highlighting the vital contribution that transport investment can play in enabling and sustaining Scotland's economic growth."*

*"We have ambitious plans… and have set bold targets for the decarbonisation of the road, rail and aviation sectors to drive the development of innovative products and services."*

*"The major asset underpinning these ambitions in high value manufacturing is the Advanced Manufacturing Innovation District Scotland* [adjacent to Glasgow Airport]*."*

### Update to the Climate Change Plan 2018 – 2032
*"On aviation, we will decarbonise scheduled flights within Scotland by 2040 and will work with the sector to encourage sustainable growth post COVID-19."*

*"… as we work with the aviation industry to help restore connectivity, we will do so in a way that reduces the environmental effects of aviation growth, both in the air and on the ground."*

The UK Government established its 'Jet Zero Council' in September 2020 to drive the delivery of new technologies and innovative ways to cut aviation emissions. Both the Scottish and UK Governments have also announced plans to produce aviation plans/strategies in 2021.

The Scottish Government plans to designate freeports (or greenports) during 2021 and we understand they will be designed to augment the strengths of existing clusters. The Glasgow Airport cluster is home to several leading aerospace companies and centers of excellence including the Advanced Forming Research Centre, National

Manufacturing Institute and Lightweight Manufacturing Centre. Aberdeen is the energy capital of Europe and the airport is surrounded by a number of business parks. Both Aberdeen and Glasgow Airports are actively considering bidding for greenport status.

Greenports are an important and complimentary initiative relevant to NPF4, specifically as a delivery mechanism to achieve improved and more resilient direct connectivity, strengthening economic clusters and stimulating low carbon transition and innovation. We would welcome the opportunity to discuss Greenports in more detail with the NPF4 team.

The Position Statement notes NPF4 will inform and be informed by STPR2. The STPR2 Update and Phase 1 Recommendations report was published in February 2021. Passenger and freight access to airports of national significance is defined as a strategic transport project. Improved access to major airports is being considered as part of STPR2, including the Glasgow Metro and Aberdeen rapid transit options.

The above selection demonstrates an evolving convergence across policy themes:

- recovering and growing strategic connectivity (including resilience).
- investing in low carbon technology, innovation and infrastructure to further decarbonise connectivity (including sustainable surface access).
- building on existing high potential/impact clusters (many of which are located in/around airports) to bolster economic wellbeing.

Glasgow Airport's previous response called for a 'Strategic Connectivity Enhancements' national development, broadening the scope of designation to include on-site renewable energy generation and explicit reference to improving sustainable surface access to nationally significant airports. Strategic Connectivity Enhancements would address the concurrent need for improved connectivity, net zero transition and a wellbeing economy. AGS Airports considers the refined designation would be consistent with the highlighted role of NPF4 and wider policy priorities as well as providing much needed leadership, co-ordination and spatial articulation of government priorities. We would envisage Glasgow and Aberdeen airports being integral to the designation.

Finally, it is important that aviation safety continues to be given due consideration as applications for wind farm re-powering emerge. To enhance mitigation capabilities, we developed the Glasgow Airport Strategic Turbine Mitigation Scheme, but it does require continued engagement between aviation and renewables stakeholders and consenting authorities. The scheme employs leading edge radar technology and a  process designed with the input of renewables and planning stakeholders to align with project and consenting programmes, meet developers' business objectives and satisfy aviation requirements. The scheme has been successfully operating for some time now and a number of developers have benefitted from it.

Yours sincerely



Ross Nimmo MRTPI
**Head of Planning and Development**